

FY2014- 2016 RCRA SUBTITLE C HAZARDOUS WASTE GRANT WORKPLAN
Pennsylvania Department of Environmental Protection
FY 2014

GENERAL, ADMINISTRATIVE, AND REPORTING REQUIREMENTS [STRATEGIC PLAN GOAL 3]

A. GENERAL

1. The Grantee agrees to implement its permit, closure, compliance, and enforcement program in accordance with the performance expectations set forth in EPA's "National Criteria for a Quality Hazardous Waste Management Program under RCRA." (EPA/530/SW-86-021, July 1986).
2. Should EPA determine that program revision or withdrawal is necessary, the Grantee must enter into a Cooperative Arrangement with EPA in order to maintain the Grantee's eligibility for federal funding. The Cooperative Arrangement will detail the activities the Grantee will perform to assist EPA in the implementation of the National RCRA program.
3. If at any time during the budget period the recipient discovers that a grant commitment will not be met, the recipient should notify the EPA Project Officer, in writing, within 15 days of identifying the projected shortfall. An explanation should be provided as to why the commitment will not be met and propose an alternate schedule or comparable activity, as appropriate. Prior approval should be obtained from EPA before implementing an alternate schedule or comparable activity.

B. ADMINISTRATIVE

1. The Grantee agrees to submit a written midyear report to EPA by April 30 of each year summarizing program accomplishments for the first half of the fiscal year, and indicating if they expect to meet their grant commitments for the year. The Grantee agrees to submit an Exception Report to EPA by October 30 of each year outlining all grant commitments that it did not meet, and how it expects to remedy the shortfall.

If requested by EPA, the Grantee agrees to meet with EPA Program personnel within 60 days of the end of the second quarter of the fiscal year (March 31) and the end of the fourth quarter of the fiscal year (September 30), to discuss the Grantee's performance relative to the program commitments set forth in the grant work plan.

2. Pursuant to 40 CFR §271.8, EPA reserves the right to request from the Grantee any additional information EPA deems necessary to fulfill its oversight responsibilities. The Grantee will provide EPA with the requested information within fifteen (15) days of EPA's request.

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3. Upon submittal of the EPA Financial Status Report, the Grantee agrees to provide a written explanation of the circumstances surrounding any unobligated balance of Federal funds and/or any related grant commitments which were not met.

C. CORRECTIVE ACTION AND PERMITTING (INCLUDING CLOSURE, POST CLOSURE, AND COMBUSTION)

1. The Grantee agrees to provide EPA with corrective action program deliverables for work associated with the corrective action grant commitments. All deliverables will be submitted to the EPA State Program Manager.
 - A. PDF of the final version of the following:
 - Environmental Indicator Reports
 - Statements of Basis
 - Final Determinations
 - B. Electronic copies of the following:
 - Validated Google Earth KML polygon files showing entire facility property boundary and the areal extent of each engineering and institutional control if different from the property boundary (e.g., capped areas within the facility, or a delineated no-dig area, etc.)
 - Institutional Controls (e.g., environmental covenants)
 - Financial Assurance Review and approvals
 - C. For Corrective Action facilities that rely on an environmental covenant for land use control AND the State department/agency is the lone "Agency," copies of all notices received by the Department /Agency that are required in the event a change is made to a covenant.
2. The Grantee agrees to provide EPA the following permit and closure information:
 - A. Copies of all permit applications submitted to the state within two weeks of receipt;
 - B. Copies of full draft permits and permit modifications that include corrective action conditions, within two weeks of public notice; and
 - C. For all facilities, the Grantee agrees to submit to EPA, within ten (10) working days of completion, a copy of all final permits issued, modified, reissued, permit denial or withdrawal actions.

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3. The Grantee agrees to electronically provide EPA notice of the following closure/post-closure data and information within 30 days of occurrence or receipt:

- A. Copies of the public notices announcing receipt of closure/post-closure plans and public hearings, if applicable;
- B. Copies of the approved closure and post-closure permits, orders, plans or other instruments, including ground water monitoring plans, for all facilities;
- C. Copies of the closure certifications for facilities signed by an independent registered professional engineer (or an independent qualified soil scientist, in cases of land treatment facilities) and the owner or operator;
- D. Copies of the State's reports of inspections conducted during closure and after receipt of closure certification;
- E. Copies of any notice placed in the property deed, or other instrument that is normally examined during a title search, annotating the existence of any closed disposal facility/unit or cell; and
- F. Ground water monitoring data related to CME inspections.

4. Financial assurance

- A. Information pertaining to permitting and corrective action will be entered into RCRAInfo for the facility-specific Financial Assurance mechanism.
- B. Grantee will enter into RCRAInfo by the end of year the following events for each facility (all that is applicable):
 - Changes in mechanisms;
 - Notices of Violation;
 - Mechanisms with cost estimates that change greater than 10% percent
- C. EPA Region 3 will review an undetermined number of Financial Test/Corporate Guarantee submissions per year for compliance with closure/post closure regulations. Facilities may substitute other financial assurance mechanisms, as

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needed. EPA will identify and requests copies of documentation for these randomly selected facilities, or request to come on site to conduct the review in the state offices.

5. The Grantee agrees to provide EPA the following Hazardous Waste Combustion information within 30 days of occurrence or receipt:

A. Permits

- Applications
- Draft permits (including Clean Air Act Title V permits where MACT EEE applies)
- Final permits (including Clean Air Act Title V permits where MACT EEE applies)
- Permit modifications

B. Notifications (these are MACT requirements that are, in effect, self-implementing permits)

- Documentation of compliance
- Notification of compliance

C. Testing

- Trial burn/comprehensive performance test (CPT) plans
- Trial burn/CPT reports
- Confirmatory performance test reports

D. Combustion Risk Assessments (these should be rare going forward)

- Risk assessment protocol
- Risk assessment report

6. The State agrees to notify EPA of its intent to grant any waiver or variance at least 10 days before it is granted, and to provide EPA a copy of the final action within 10 days of issuance.

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Goal 3 Cleaning up Communities and Advancing Sustainable Development – Clean up communities, advance sustainable development, and protect disproportionately impacted low-income, minority, and tribal communities. Prevent releases of harmful substances and clean up and restore contaminated areas.

Objective 3.2: Preserve Land. Conserve resources and prevent land contamination by reducing waste generation, increasing recycling, and ensuring proper management of waste and petroleum products.

| | | | |
|---|-----------------------------|---|---|
| Work Plan Component: Hazardous Waste Permitting | Work Year: 9 FTE | Fiscal Year: 2014 | FY15 commitments will be negotiated in the fourth quarter of FY14 |
| | % of Funding Allocated: 20% | EPA Contact: Andrea Barbieri State Contacts: Glenn Mitzel, Tom Mellott | |

| Measures | Planned Accomplishments | Midyear/ End of Year Status/Comments |
|----------|-------------------------|--------------------------------------|
|----------|-------------------------|--------------------------------------|

State Level Results:

Number of hazardous waste facilities with new or updated controls ACS – HWO

Outcomes/Outputs/Commitments

P.1 Status of New Permits

| Facility Name | EPA ID # | Status |
|-----------------------|--------------|--|
| Action Manufacturing | PAD096844311 | Midyear and EOY Status: New Permit issued 11/01/13. |
| Elcon Recyc. Services | PAR000544486 | Received Phase I Exclusionary Siting Part A application on 03/27/14. EOY Status: Application deemed administratively complete 09/16/14. |

P.2 Permit Renewals - Through FY16

| Facility Name | EPA ID | FY Expired | FY Expected | Status Update |
|--|--------------|-------------------|-------------|--|
| Johnson Matthey (Lonza, Inc.) | PAD980550412 | 10/03/10 FY11 | FY14 | Midyear Status: Draft Permit 11/15/13. EOY Status: No progress. |
| Merck & Co. | PAD002387926 | 9/15/12 FY12 | FY14 | Midyear Status: Draft Permit 12/ 20/13. EOY Status: Permit issued 07/29/14. |
| Republic Environmental Systems | PAD085690592 | 5/9/12 FY12 | FY14 | Midyear Status: Permit revision received 09/ 9/13. EOY Status: Draft Permit 07/16/14. |
| Safety Kleen - West Mifflin | PAD982576258 | 3/7/13/13 FY14 | FY14 | Midyear Status: Technical deficiency letter sent out 10/11/13. Permit revision received 01/8/14. EOY Status: Draft Permit 08/11/14. |
| United Environmental Group, Inc. (cont.) | PAD987283140 | 10/31/13 F4 | FY14 | Midyear Status: Facility will not re-permit. The SWRO is working on closure for the facility. |

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| Measures | Planned Accomplishments | | | | Midyear/ End of Year Status/Comments | |
| | | PAD987283140 | (Cont.) | (Cont.) | EOY Status: Referred to compliance section for possible enforcement action. | |
| | Waste of Fairless Hills, LLC (Borrow Pit 20) | PAR000537548 | 12/22/13 FY14 | FY14 | Midyear Status: Transfer of Ownership From US Steel Corp Fairless Hills (PAD002375376) to Waste Management of Fairless Hills approved 11/15/13. Renewal Post-Closure Permit application received 06/24/ 13 is under review. EOY Status: No progress. | |
| | Nexeo Solutions LLC | PAD000797548 | 5/14/14 FY14 | FY14 | Midyear Status: Renewal application received 11/13/ 13. Incompleteness letter sent out 12/16/ 13. EOY Status: Technical deficiency letter 08/01/14. | |
| | Safety Kleen Johnstown | PAD981736143 | 6/2/14 FY14 | FY14 | Midyear Status: Renewal application received 12/03/13. Incompleteness letter sent on 02/07/14. EOY Status: Technical Deficiency letter 09/12/14. | |
| | East Penn | PAD002330165 | 9/1/14 FY14 | FY14 | Midyear Status: Permit renewal received 02/08/14. It was undergoing completeness review. EOY Status: Technical Deficiency letter 07/24/14. | |
| | Safety Kleen - Wilkes Barre | PAD981737109 | 1/3/15 FY15 | FY15 | EOY Status: Permit renewal received 06/12/14. | |
| | American Color & Chemical LLC | PAD003047792 | 1/7/15 FY15 | FY15 | EOY Status: Permit received and deemed administratively complete 7/28/14. | |
| | Max Environmental - Yukon | PAD004835146 | 2/14/15 FY15 | FY15 | EOY Status: Received Permit Renewal application, 08/19/14. | |

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| | | | | | |
| Bethlehem Apparatus Co Inc. Hellertown | PAD002390961 | 2/16/15 FY15 | FY15 | | |
| South Taylor Environmental Park | PAD000739672 | 8/18/15 FY15 | FY15 | | |
| Bettis Atomic Power Lab | PA0890090004 | 2/2/16 FY16 | FY16 | | |
| Envirite of Pennsylvania | PAD0010154045 | 2/17/16 FY16 | FY16 | | |
| Inmetco | PAD087561015 | 7/14/16 FY16 | FY16 | | |
| Kelly Run | PAD004810222 | 8/14/16 FY16 | FY16 | | |
| AERC | PAD987367216 | 8/16/16 FY16 | FY16 | | |

P.3 Emergency Permits Issued

| Facility Name | EPA ID # | Date Issued | Purpose of Issuance |
|---------------|----------|-------------|---------------------|
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| Work Plan Component: Hazardous Waste Permitting | Work Year: 9 FTE | Fiscal Year: 2014 | FY15 commitments will be negotiated in the fourth quarter of FY14 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| <p>P.4 Permit Modifications</p> <table border="1"> <thead> <tr> <th>Facility Name</th><th>EPA ID #</th><th>Date Issued</th><th>Summary of Modification</th></tr> </thead> <tbody> <tr> <td>Safety Kleen Systems, Inc. Erie</td><td>PAD096673407</td><td>10/04/13</td><td>Class I modification to remove permit conditions that are no longer applicable to the facility.</td></tr> <tr> <td>Philadelphia Energy Solutions (PES), Philadelphia Refinery</td><td>PAD049791098</td><td>11/13/13</td><td>Class I modification for the transfer of ownership and permit from Sunoco Inc. (R&M) to PES.</td></tr> <tr> <td>World Resources Company</td><td>PAD981038227</td><td>11/02/13</td><td>Class II modification to upgrade and improve the secondary containment system of the hydromet recycling process.</td></tr> <tr> <td>Waste Management of Fairless Hills, LLC</td><td>PAR000537548</td><td>11/15/13</td><td>Class I modification to transfer ownership for Borrow Pit 20 from U.S. Steel Corp. to Waste Management of Fairless Hills, LLC</td></tr> <tr> <td>Honeywell Resins & Chemicals, LLC</td><td>PAD00232791</td><td>03/05/14</td><td>Class II modification to add four new hazardous waste codes to facility.</td></tr> <tr> <td>Letterkenny Army Depot</td><td>PA6213820503</td><td>N/A</td><td>Received Class III permit modification on 02/27/14. Draft Permit issued 09/24/14.</td></tr> <tr> <td>Bethlehem Apparatus</td><td>PAD000453084</td><td>N/A</td><td>Received Class III permit modification on 10/2/13. Technical deficiency letter sent out 6/24/14.</td></tr> <tr> <td>Evoqua Water Tech.</td><td>PAD987270725</td><td>09/10/2014</td><td>Class I permit modification Name change from Siemens Water Tech., LLC to Evoqua Water Tech., LLC.</td></tr> <tr> <td>Evoqua Water Tech.</td><td>PAD987270725</td><td>09/30/2014</td><td>Class I permit mod. Replacement of Scrubber System.</td></tr> <tr> <td>Calgon Carbon Corporation</td><td>PAD000736942</td><td>N/A</td><td>Received a Class3 permit modification on 07/24/14. Administrative Incompleteness letter sent out 09/26/14.</td></tr> <tr> <td>Envirite of PA</td><td>PAD010154045</td><td>N/A</td><td>Received Class 2 permit modification. Admin Complete 08/09/14</td></tr> </tbody> </table> | Facility Name | EPA ID # | Date Issued | Summary of Modification | Safety Kleen Systems, Inc. Erie | PAD096673407 | 10/04/13 | Class I modification to remove permit conditions that are no longer applicable to the facility. | Philadelphia Energy Solutions (PES), Philadelphia Refinery | PAD049791098 | 11/13/13 | Class I modification for the transfer of ownership and permit from Sunoco Inc. (R&M) to PES. | World Resources Company | PAD981038227 | 11/02/13 | Class II modification to upgrade and improve the secondary containment system of the hydromet recycling process. | Waste Management of Fairless Hills, LLC | PAR000537548 | 11/15/13 | Class I modification to transfer ownership for Borrow Pit 20 from U.S. Steel Corp. to Waste Management of Fairless Hills, LLC | Honeywell Resins & Chemicals, LLC | PAD00232791 | 03/05/14 | Class II modification to add four new hazardous waste codes to facility. | Letterkenny Army Depot | PA6213820503 | N/A | Received Class III permit modification on 02/27/14. Draft Permit issued 09/24/14. | Bethlehem Apparatus | PAD000453084 | N/A | Received Class III permit modification on 10/2/13. Technical deficiency letter sent out 6/24/14. | Evoqua Water Tech. | PAD987270725 | 09/10/2014 | Class I permit modification Name change from Siemens Water Tech., LLC to Evoqua Water Tech., LLC. | Evoqua Water Tech. | PAD987270725 | 09/30/2014 | Class I permit mod. Replacement of Scrubber System. | Calgon Carbon Corporation | PAD000736942 | N/A | Received a Class3 permit modification on 07/24/14. Administrative Incompleteness letter sent out 09/26/14. | Envirite of PA | PAD010154045 | N/A | Received Class 2 permit modification. Admin Complete 08/09/14 | | | |
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| World Resources Company | PAD981038227 | 11/02/13 | Class II modification to upgrade and improve the secondary containment system of the hydromet recycling process. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Waste Management of Fairless Hills, LLC | PAR000537548 | 11/15/13 | Class I modification to transfer ownership for Borrow Pit 20 from U.S. Steel Corp. to Waste Management of Fairless Hills, LLC | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Honeywell Resins & Chemicals, LLC | PAD00232791 | 03/05/14 | Class II modification to add four new hazardous waste codes to facility. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Letterkenny Army Depot | PA6213820503 | N/A | Received Class III permit modification on 02/27/14. Draft Permit issued 09/24/14. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Bethlehem Apparatus | PAD000453084 | N/A | Received Class III permit modification on 10/2/13. Technical deficiency letter sent out 6/24/14. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Evoqua Water Tech. | PAD987270725 | 09/10/2014 | Class I permit modification Name change from Siemens Water Tech., LLC to Evoqua Water Tech., LLC. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Evoqua Water Tech. | PAD987270725 | 09/30/2014 | Class I permit mod. Replacement of Scrubber System. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Calgon Carbon Corporation | PAD000736942 | N/A | Received a Class3 permit modification on 07/24/14. Administrative Incompleteness letter sent out 09/26/14. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Envirite of PA | PAD010154045 | N/A | Received Class 2 permit modification. Admin Complete 08/09/14 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | | |
| | <p>P.5 Actions associated with other oversight, management and maintenance of active permits</p> <p>P.6 Ensure all applicable permitting and financial assurance information is entered into RCRAInfo within 30 days of occurrence or receipt</p> <p>P.7 Financial Assurance</p> <ul style="list-style-type: none">• Ensure all permit, closure and post closure facilities meet financial assurance requirements Provide EPA with requested financial assurance documents for review• Conduct annual Financial Assurance evaluations (report out number)• Enter all applicable financial assurance information into RCRAInfo including, but not limited to:<ul style="list-style-type: none">○ Changes in mechanisms○ Notice of violations○ Mechanisms with cost estimates that change | <p>P.5 Midyear and EOY Status: On-going.</p> <p>P.6 Midyear Status: The RCRAInfo FA module has been updated with all current FA information, and is updated on a semiannual basis.</p> <p>P.7 Midyear and EOY Status:</p> <p>EPA FA Audit – Nexeo Solutions, LLC PAD000797548 (1/15/2014)</p> <p>Financial Test/corporate guarantee evaluations: East Penn Manufacturing PAD002330165 (10/15/2013) Air Products and Chemicals PAD003001070 (3/6/2014) Dow Chemical corporate guarantee for Rohm & Haas PAD002292068 (1/9/2014) Alcoa PAD003026663 (6/23/2014) GE Lancaster PAD003026903, Erie PAD005033055 (6/5/2014)</p> | |

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| | greater than 10% | | Dow Chemical Company for Rohm & Haas, LLC. PAD002292068 (7/7/2014) Received and under company revision: Merck & Co. Inc. West Point Manufacturing PAD002387926, Cherokee Pharmaceuticals LLC PAD0030443353 (4/24/2014) Sunoco Logistics Partners L.P. PAD980550594 (6/5/2014) P.7 (Cont.) <u>NOV</u> United Environmental Group, Inc. PAD987283140 (11/7/2013) <u>Change >10%</u> Dow Chemical Company for Rohm & Haas, LLC. PAD002292068 (1/9/2014) P.8 Midyear and EOY Status: On-going |

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| | closure plans and public hearings, if applicable | | |
| | <p>B. Closure/Post Closure data and information: (<i>within 30 days of occurrence or receipt</i>)</p> <ul style="list-style-type: none"> • Approved closure and post closure permits, orders, plans, or other instruments, including ground water monitoring plans • Closure certifications • Reports of inspections during closure activities • Notice placed in the property deed, or other instruments examined in title search, annotating the existence of any closed disposal facility/unit or cell • CME inspection reports | | Midyear and EOY Status: No activity. |
| | <p>C. Combustion information: (<i>within 30 days of occurrence or receipt</i>)</p> <p><u>Permit</u></p> <ul style="list-style-type: none"> • Draft permit applications • Draft permits (including Clean Air Act Title V permits where MACT EEE applies) • Final permits (including Clean Air Act Title V permits where MACT EEE applies) • Permit modifications <p><u>Notifications</u> (MACT requirements that are, in effect, self-implementing permits)</p> | | Midyear and EOY Status: No activity. |

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| Goal 3 Cleaning up Communities and Advancing Sustainable Development – Clean up communities, advance sustainable development, and protect disproportionately impacted low-income, minority, and tribal communities. Prevent releases of harmful substances and clean up and restore contaminated areas. | | | |
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| Objective 3.2: Preserve Land. Conserve resources and prevent land contamination by reducing waste generation, increasing recycling, and ensuring proper management of waste and petroleum products. | | | |
| Work Plan Component: Hazardous Waste Permitting | Work Year: 9 FTE | Fiscal Year: 2014 EPA Contact: Andrea Barbieri State Contacts: Glenn Mitzel, Tom Mellott | FY15 commitments will be negotiated in the fourth quarter of FY14 |
| | % of Funding Allocated: 20% | | |
| Measures | Planned Accomplishments | | Midyear/ End of Year Status/Comments |
| | <ul style="list-style-type: none">• Documentation of compliance• Notification of compliance <u>Testing</u> <ul style="list-style-type: none">• Trial burn/comprehensive performance test (CPT) Plans• Trial burn/CPT reports• Confirmatory performance test reports <u>Combustion Risk Assessments</u> (these should be rare going forward) <ul style="list-style-type: none">• Risk assessment protocol• Risk assessment report | | |

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| Objective 3.3: Restore Land. Prepare for and respond to accidental or intentional releases of contaminants and clean up and restore polluted sites | | | |
| Work Plan Component: Corrective Action and Revitalization | Work Year: 5 FTE | Fiscal Year: 2014 | FY15 commitments will be negotiated in the fourth quarter of FY14 |
| | % of Funding Allocated: 17.5% | EPA Contact: Andrea Barbieri, Paul Gotthold State Contacts: Glenn Mitzel, Melissa Gross | |
| Measures | Planned Accomplishments | | Midyear/ End of Year Status/Comments |
| State Level Results: EPA Regional/National Level Results: <ul style="list-style-type: none"> Number of RCRA facilities with human exposure under control ACS – CA1 Number of RCRA facilities with migration of contaminated ground water under control ACS – CA2 Number of RCRA facilities final remedies constructed ACS – CA5 <p>The plans to accomplish these goals should incorporate Environmental Justice considerations and priority should be given to facilities in the Chesapeake Bay watershed.</p> <p>Outcome: By 2020 permanently eliminate or control hazardous waste impacts to public health and to</p> | Outcomes/Outputs/Commitments C.1 Construction completed at <u>57</u> % of the 2020 Universe by 2014 (20 sites) C.2 Human Health EIs completed at <u>85</u> % of the 2020 Universe by 2015 (20 sites). C.3 Groundwater EIs completed at <u>78</u> % of the 2020 Universe (15 sites). C.4 Site Visits and Follow Up Investigations <u>7</u> C.5 Remedy selected at <u>65</u> % of the 2020 Universe (20 sites). C.6 Status Update at midyear and end of year on all corrective action facilities (<i>provide attached table</i>) C.7 Deliverables – The Grantee agrees to provide EPA with corrective action program deliverables for work associated with the corrective action grant commitments. | | C.1 Midyear Status: 1 EOY Status: 20 C.2 Midyear Status : 4 EOY Status: 20 C.3 Midyear Status: 6 EOY Status: 16 C.4 Midyear and EOY Status: 3. PADEP completed all assigned follow up investigations with the exception on Monach Circuits which was assigned after the GTAC Contract expired. Monach will be completed in FY15 with the new GTAC Contractor, URS Corporation. (See Corrective Action attachment for details). C.5 Midyear Status: 1 EOY Status: 20 C.6 Midyear and EOY Status: See 2014 Final Corrective Action Site Status document (attachment). Contract with Michael Baker Jr., Inc. ended May 31, 2014. URS is the new contractor. C.7 (see C.6) |

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| Objective 3.3: Restore Land. Prepare for and respond to accidental or intentional releases of contaminants and clean up and restore polluted sites | | | |
| Work Plan Component: Corrective Action and Revitalization | Work Year: 5 FTE | Fiscal Year: 2014 | FY15 commitments will be negotiated in the fourth quarter of FY14 |
| | % of Funding Allocated: 17.5% | EPA Contact: Andrea Barbieri, Paul Gotthold State Contacts: Glenn Mitzel, Melissa Gross | |
| Measures | Planned Accomplishments | | Midyear/ End of Year Status/Comments |
| the environment from past or current releases to the environment from facilities subject to RCRA Corrective Action. | <p>All deliverables will be submitted to the EPA State Program Manager.</p> <p>A. PDF of the final version of the following:</p> <ul style="list-style-type: none"> • Environmental Indicator Reports • Statements of Basis • Final Determinations <p>B. Electronic copies of the following:</p> <ul style="list-style-type: none"> • Validated Google Earth KML polygon files showing entire facility property boundary and the areal extent of each engineering and institutional control if different from the property boundary (e.g., capped areas within the facility, or a delineated no-dig area, etc.). • Institutional Controls (e.g., environmental covenants) • Financial Assurance reviews and approvals <p>C. For Corrective Action Facilities that rely on an environmental covenant for land use control AND PADEP is the lone "Agency": PADEP agrees to forward to EPA Region 3 copies of all notices received by the Department pursuant to the Uniform Environmental Covenants Act, under Section 6509 and 6510. These notices are required by the Act in the event a change is made to the covenant.</p> | | <p>Midyear and EOY status: On-going</p> <p>Per EPA Region 3, EPA and DEP's ECB, Act 2 program are working together to add a condition in the covenant to address this issue.</p> |

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| Goal 5: Enforcing Environmental Laws - Protect human health and the environment through vigorous and targeted civil and criminal enforcement. Assure compliance with environmental laws. | | | |
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| Objective 5.1: Enforce Environmental Laws - Pursue vigorous civil and criminal enforcement that targets the most serious water, air, and chemical hazards in communities. Assure strong, consistent, and effective enforcement of federal environmental laws nationwide. | | | |
| Work Plan Component: Compliance and Enforcement | Work Year: 12 FTE % of Funding Allocated: 35% | Fiscal Year: 2014 EPA Contact: Andrea Barbieri State Contacts: Renee Bartholomew, Tom Mellott | FY15 commitments will be negotiated in the fourth quarter of FY14 |
| Measures | Planned Accomplishments | | Midyear/ End of Year Status/Comments |
| State Level Results: TSDs – Inspect at least 50% of the universe ACS #RCRA01.s LQG's - Inspect at least 20% of the universe ACS# RCRA02.s States may substitute inspections of SQGs, CESQGs, Non-notifies, and/or Other RCRA Handlers (in lieu of LQG inspections) under an approved Alternate Plan | Outcomes/Outputs/Commitments E.1 Number of inspections of Federal TSDs – 3 (Total number of Federal TSDs – 3) E.2 Number of inspections of Private TSDs not inspected during previous year – 59 (Total number of TSDs: Active – 39; Post-Closure – 11) E.3 Number of inspections of State & Local TSDs – N/A (Total number of State & Local TSDs – N/A) E.4 Number of inspections of LQGs – 220 (Total number of LQGs – 1100) E.5 Number of inspections of LDFs (<i>report out, no specific commitment needed</i>) Total number of LDF inspections due this FY - 16 | | E.1 Midyear Status: Zero Federal TSDF inspections have been conducted. PADEP expects 100% of the inspections to be completed during this FFY. EOY: Three (3) federal TSD inspections have been conducted. This is 100% completion of the obligation. E.2 Midyear Status: There were 30 Private TSDs that were NOT inspected during the previous year EOY: There were 12 Private TSDs that were NOT inspected during the previous year. E.3 N/A (no State/Local TSDs in PA) E.4 Midyear Status: PADEP conducted 193 LQG inspections. EOY: PA DEP conducted 422 LGQ inspections at 343 facilities. This is 100% completion of the obligation. E.5 Midyear Status: Zero LDF inspections have been conducted. The evaluations are performed during the spring, summer and fall months. PADEP expects 100% of the inspections to be completed during this FFY. EOY: Thirteen (13) LDF inspections have been conducted. This is 100% completion of the obligation. |

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| Goal 5: Enforcing Environmental Laws - Protect human health and the environment through vigorous and targeted civil and criminal enforcement. Assure compliance with environmental laws. | | | |
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| Objective 5.1: Enforce Environmental Laws - Pursue vigorous civil and criminal enforcement that targets the most serious water, air, and chemical hazards in communities. Assure strong, consistent, and effective enforcement of federal environmental laws nationwide. | | | |
| Work Plan Component: Compliance and Enforcement | Work Year: 12 FTE | Fiscal Year: 2014 EPA Contact: Andrea Barbieri | FY15 commitments will be negotiated in the fourth quarter of FY14 |
| | % of Funding Allocated: 35% | State Contacts: Renee Bartholomew, Tom Mellott | |
| Measures | Planned Accomplishments | | Midyear/ End of Year Status/Comments |
| | <p>E.6 Number of inspections of SQGs and CESQGs – 275 and 125, respectively (Total number SQGs – 4,406 and CESQG – 3,629)</p> <p>E.7 SNC activity: <i>(report only, no specific commitments)</i> Number of new Significant Non-Compliers (SNCs) Number of SNCs resolved</p> <p>E.8 Enter all required data obtained from compliance inspections into RCRAInfo no later than 30 days following the inspection. This includes violations, enforcement response, etc. Inspections will identify significant non-compliers (SNCs), and the appropriate SNC data will be entered into RCRAInfo within 30 days.</p> | | <p>E.6 Midyear Status: PADEP conducted 244 and 169 SQG and CESQG inspections, respectively. EOY: PA DEP conducted 424 inspections at 377 SQG facilities. PA DEP conducted 276 inspections at 246 CESQG facilities. This is 100% completion of the obligation.</p> <p>E.7 Midyear Status: There are a total of 11 Handlers in SNC status. Two new SNYs were added (Creative Recycling Systems/Lord Corp.) and one was resolved (Eldredge). EOY: There are a total of 12 Handlers in SNC status. Four (4) new SNCs were added (Creative Recycling Systems/ Woodcraft/ Lord Corp/ Freedom Alloy). Two (2) were resolved (Eldredge/ MAX Env'l).</p> <p>E.8 Midyear Status: PADEP entered all compliance inspection data, including SNCs into eFACTS so that the data translated to RCRAInfo within 30 days following the inspections and/or SNC determinations. EOY: PADEP entered all compliance inspection data, including SNCs into eFACTS so that the data translated to RCRAInfo within 30 days following the inspections and/or SNC determinations.</p> |

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| Goal 5: Enforcing Environmental Laws - Protect human health and the environment through vigorous and targeted civil and criminal enforcement. Assure compliance with environmental laws. | | | |
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| Objective 5.1: Enforce Environmental Laws - Pursue vigorous civil and criminal enforcement that targets the most serious water, air, and chemical hazards in communities. Assure strong, consistent, and effective enforcement of federal environmental laws nationwide. | | | |
| Work Plan Component: Compliance and Enforcement | Work Year: 12 FTE | Fiscal Year: 2014 EPA Contact: Andrea Barbieri State Contacts: Renee Bartholomew, Tom Mellott | FY15 commitments will be negotiated in the fourth quarter of FY14 |
| | % of Funding Allocated: 35% | | |
| Measures | Planned Accomplishments | | Midyear/ End of Year Status/Comments |
| | <p>E.9 Ensure any enforcement actions are taken in accordance with the “timely and appropriate” criteria established in EPA’s December 2003 “Enforcement Response Policy (ERP).”</p> <p>E.10 Provide EPA, upon request, with copies of reports or data resulting from any compliance inspection and subsequent enforcement actions.</p> | | <p>E.9 Midyear Status: PADEP continued to ensure that enforcement actions were taken in accordance with the EPA “ERP” and also with PADEP’s Enforcement Policy. The total number of T/A actions is 140. A report is available that describes specific T/A action status. EOY: PADEP continued to ensure that enforcement actions were taken in accordance with the EPA “ERP” and also with PADEP’s Enforcement Policy. The total number of T/A actions is 158. A report is available that describes specific T/A action status.</p> <p>E.10 Midyear Status: PADEP provided EPA with copies of inspection and enforcement action reports and/or data (i.e., groundwater monitoring evaluations, inspection reports, SNC reports, etc.). EOY: E.1 PADEP provided EPA with copies of inspection and enforcement action reports and/or data (i.e., groundwater monitoring evaluations, inspection reports, SNC reports, etc.).</p> |

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| Goal 3 Cleaning up Communities and Advancing Sustainable Development – Clean up communities, advance sustainable development, and protect disproportionately impacted low-income, minority, and tribal communities. Prevent releases of harmful substances and clean up and restore contaminated areas. | | | |
| Objective 3.1: Promote Sustainable and Livable Communities - Support sustainable, resilient, and livable communities by working with local, state, tribal, and federal partners to promote smart growth, emergency preparedness and recovery planning, brownfield redevelopment, and the equitable distribution of environmental benefits. | | | |
| Work Plan Component: Data Management | Work Year: 9.5 FTE | Fiscal Year: 2014 | FY15 commitments will be negotiated in the fourth quarter of FY14 |
| | % of Funding Allocated: 20% | EPA Contacts: Andrea Barbieri, Susie Chun State Contacts: Renee Bartholomew, Tom Mellott | |
| Measures | Planned Accomplishments | | Midyear/ End of Year Status/Comments |
| <p>State Level Results:</p> <p>Quality, complete, accurate and up to date information entered into RCRAInfo. The following data is required to be entered into RCRAInfo</p> <ul style="list-style-type: none"> • GPRA • 2020 Corrective Action Universe • Biennial Reporting <p>Comply with RCRAInfo requirements as stated in this Workplan and in the attached RCRAInfo technical document.</p> | <p>Outcomes/Outputs/Commitments</p> <p><i>Implementer of Records</i></p> <p>D.1 Maintain IOR status for all modules for which the state is currently IOR:</p> <ul style="list-style-type: none"> ○ Enter all required information into RCRAInfo: <ul style="list-style-type: none"> ▪ Within 30 days of occurrence of activity for corrective action, permitting, financial assurance, handler and CM&E activities. <p>D.2 For modules where the State is/is not authorized and/or sharing the work with EPA, and is not the IOR:</p> <ul style="list-style-type: none"> ○ Provide information to EPA: <ul style="list-style-type: none"> ▪ Within 30 days of occurrence of activity for corrective action, permitting, financial assurance, handler and CM&E activities. <p>D.3 Where the state is authorized, but is not the IOR for the corresponding module, pursue IOR status and report on progress.</p> <p>D.4 Biennial Reporting is required in 2014. During FY14, States will comply with EPA deadlines regarding BR data submittal and data quality checks.</p> | | <p>D.1 Midyear and EOY Status: PADEP maintained IOR status and entered data within 30 days of occurrence of activity for all modules for which it is IOR.</p> <p>D.2 Midyear and EOY Status: PADEP provided all information to EPA within 30 days of occurrence of activity for modules (i.e., permitting) for which it is not IOR or and/or sharing the work with EPA.</p> <p>D.3 Midyear and EOY Status: Nothing to report.</p> <p>D.4 Midyear Status: PADEP is maintaining compliance with the EPA deadlines for the 2014 BR Reporting.</p> |

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Objective 3.1: Promote Sustainable and Livable Communities - Support sustainable, resilient, and livable communities by working with local, state, tribal, and federal partners to promote smart growth, emergency preparedness and recovery planning, brownfield redevelopment, and the equitable distribution of environmental benefits.

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| Work Plan Component: Data Management | Work Year: 9.5 FTE | Fiscal Year: 2014 | FY15 commitments will be negotiated in the fourth quarter of FY14 |
| | % of Funding Allocated: 20% | EPA Contacts: Andrea Barbieri, Susie Chun State Contacts: Renee Bartholomew, Tom Mellott | |

| Measures | Planned Accomplishments | Midyear/ End of Year Status/Comments |
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| | <p>Translation</p> <p>D.5 Verify translation is working properly.</p> <ul style="list-style-type: none"> ○ Report on any updated changes to the system related to RCRAInfo updates ○ Update EPA on any translation failures, issues, and resolutions within 30 days ○ Enter data directly into RCRAInfo if translation failures continue for more than 3 months <p>D.6 Maintain QA checks on translation data.</p> <p>Maintenance</p> <p>D.7 Permitting - ensure that each unit has the required permitting event codes entered into RCRAInfo (see RCRAInfo technical document).</p> | <p>D.5 Midyear Status: PADEP monitored translation activity. For all translated data, a QA report was generated and reviewed during each translation period. Minor translation failures occurred infrequently for data in the Handler and CME modules. Correction of data translation failures (Handler and CME) occurred within one to five days upon discovery. No major translation failures occurred. For translation failures greater than 2 weeks, data was entered manually following EPA approval.</p> <p>EOY: PA DEP monitored translation activity. For all translated data, a QA report was generated and reviewed during each translation period. Minor translation failures occurred infrequently for data in the Handler and CME modules. Correction of data translation failures occurred within one to five days upon discovery. No major translation failures occurred.</p> <p>D.6 Midyear and EOY Status: PADEP maintained QA checks in accordance with its eFACTS/RCRAInfo Data QA/QC Plan.</p> <p>D.7 Midyear and EOY Status: PADEP ensures that each unit has the required event codes entered into RCRAInfo.</p> |

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| Work Plan Component: Data Management | Work Year: 9.5 FTE | Fiscal Year: 2014 | FY15 commitments will be negotiated in the fourth quarter of FY14 |
| | % of Funding Allocated: 20% | EPA Contacts: Andrea Barbieri, Susie Chun State Contacts: Renee Bartholomew, Tom Mellott | |
| Measures | Planned Accomplishments | | Midyear/ End of Year Status/Comments |
| | <p>D.8 Corrective Action – ensure that the appropriate authorities, areas of concern, and required event codes are entered into RCRAInfo (<i>see RCRAInfo technical document</i>).</p> <p>D.9 Financial assurance – ensure that all required data pertaining to FA is entered into RCRAInfo is kept up-to date.</p> <p>D.10 Ensure that all changes in RCRAInfo and changes in program policy that impact RCRA data are integrated into the State’s data management processes and procedures within 90 days of announcement of the changes.</p> <p>Quality Assurance</p> <p>D.11 Ensure appropriate quality assurance procedures are in place to maintain complete and accurate RCRAInfo data. Please report specifically on the following QA activities:</p> <ul style="list-style-type: none"> ○ What QA checks were performed ○ Who Performed the QA checks ○ Frequency of checks ○ Corrective measures | | <p>D.8 Midyear and EOY Status: EPA Region 3 is responsible for corrective action data entered into RCRAInfo.</p> <p>D.9 Midyear and EOY Status: PADEP ensured financial assurance data entered into RCRAInfo was up-to-date. We ran a Financial Assurance Required Report on PA facilities and updated the red flagged data.</p> <p>D.10 Midyear and EOY Status: PADEP maintained an awareness of and compliance with changes in RCRAInfo requirements as determined and announced by EPA.</p> <p>D.11 Midyear and EOY Status: PADEP met this obligation in accordance with its eFACTS/RCRA Data QA/QC Plan. For example, QA checks are performed weekly and monthly for Handler and CM&E data. Incomplete, missing, outdated and/or otherwise incorrect data were corrected within a one-to a maximum 30-day period.</p> |

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| Objective 3.1: Promote Sustainable and Livable Communities - Support sustainable, resilient, and livable communities by working with local, state, tribal, and federal partners to promote smart growth, emergency preparedness and recovery planning, brownfield redevelopment, and the equitable distribution of environmental benefits. | | | |
| Work Plan Component: Data Management | Work Year: 9.5 FTE | Fiscal Year: 2014 | FY15 commitments will be negotiated in the fourth quarter of FY14 |
| | % of Funding Allocated: 20% | EPA Contacts: Andrea Barbieri, Susie Chun State Contacts: Renee Bartholomew, Tom Mellott | |
| Measures | Planned Accomplishments | | Midyear/ End of Year Status/Comments |
| | <p>Data Cleanup</p> <p>D.12 Report on progress of data cleanups performed for facilities listed on the GPRA baselines (<i>specifically list out those facilities that need cleanup</i>).</p> <p>D.13 Report on progress of data cleanups requested either by HQs or Region 3 (<i>specifically report on activities related to the clean-up such as percent complete, etc.</i>).</p> <p>D.14 Data Verification in support of the State Review Framework process – activities include:</p> <ul style="list-style-type: none"> ○ Review metrics ○ Review, correct and verify data <ul style="list-style-type: none"> ▪ Make changes in RCRAInfo for data as appropriate ▪ Report to HQ any discrepancies ○ Meet HQ deadlines regarding review, verification and freezing of data <p>Participation</p> <p>D.15 Participate in RCRAInfo conference calls of the state/EPA data management team.</p> | | <p>D.12 Midyear and EOY Status: PADEP compared permitting modules with the GPRA permitting report and made revisions required by EPA.</p> <p>D.13 Midyear Status: PADEP updated violation/citation codes and descriptions in eFACTS to ensure matching tables in eFACTS and RCRAInfo; reviewed/deleted implementer-defined codes in the CM&E Modules in RCRAInfo as directed by the Change Mngt. Group; and changed implementer-defined codes for Waste Oil facilities, and performed other, minor changes as directed by EPA.</p> <p>D.14 Midyear Status: PADEP reviewed the metrics and analyzed data for each metric. For incorrect/incomplete data, data corrections were listed and reported to EPA and work was initiated on data cleanup. PADEP met the interim and final deadline for completing the Data Verification process.</p> <p>D.15 Midyear and EOY Status: PADEP participated in all of the state/EPA conference calls.</p> |

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| Work Plan Component: Data Management | Work Year: 9.5 FTE | Fiscal Year: 2014 | FY15 commitments will be negotiated in the fourth quarter of FY14 |
| | % of Funding Allocated: 20% | EPA Contacts: Andrea Barbieri, Susie Chun State Contacts: Renee Bartholomew, Tom Mellott | |
| Measures | Planned Accomplishments | | Midyear/ End of Year Status/Comments |
| | D.16 Participate in monthly RCRAInfo National conference calls. D.17 Attend the periodic meetings of the state/EPA data management team. D.18 Attend the periodic RCRAInfo National User Conferences. D.19 Attend RCRAInfo training and refresher course, as appropriate. D.20 Participate in the Change Management review process when requested and report on these activities. | | D.16 Midyear and EOY Status: PADEP participated in all RCRAInfo National conference calls. D.17 Midyear and EOY Status: PADEP attended any/all meeting and conference call with the EPA management team. D.18 Midyear Status: There were no RCRAInfo National User Conferences. D.19 Midyear Status: There were no RCRAInfo training/refresher courses. D.20 Midyear Status: PADEP participated in all of the Change Management/USITS review and comment processes. |

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| Objective 3.1: Promote Sustainable and Livable Communities - Support sustainable, resilient, and livable communities by working with local, state, tribal, and federal partners to promote smart growth, emergency preparedness and recovery planning, brownfield redevelopment, and the equitable distribution of environmental benefits. | | | |
| Work Plan Component: Authorization and Regulatory Development | Work Year: 1.5 FTE % of Funding Allocated: 1.5% | Fiscal Year: 2014 EPA Contact: Andrea Barbieri State Contact: Dwayne Womer | FY15 commitments will be negotiated in the fourth quarter of FY14 |
| Measures | Planned Accomplishments | | Midyear/ End of Year Status/Comments |
| State Level Results: The state RCRA program will be equivalent and consistent with the federal RCRA program. | Outcomes/Outputs/Commitments <p>A.1 Adopt a regular cycle of annual updates of RCRA regulations or statutes, as appropriate. Since Pennsylvania incorporates the majority of the federal RCRA Subtitle C regulations by reference, a regular cycle of regulation updates is not applicable. PA DEP will closely track federal regulatory actions and initiate changes to our State regulations where needed to comply with Pennsylvania statutes or where deemed necessary to preserve boundaries of authority (e.g. regarding import/export regulations, etc.)</p> <p>A.2 Adopt a regular schedule of submittal of revisions authorization applications. PADEP will submit a revised authorization application by the end of the FY14 fiscal year.</p> | | <p>Midyear Status and EOY: PADEP continues to closely track federal regulatory action and will make changes when necessary to comply with Pennsylvania statutes or where deemed necessary to preserve boundaries of authority.</p> <p>Midyear Status: PADEP has made significant progress on its authorization package. A draft Demonstration of Adequate Authority for the Pennsylvania Hazardous Waste Management Program, an Application for our Program Revision IV was submitted to EPA shortly after the midyear on April 19, 2014. EOY: PA DEP received comments on the Demonstration of Adequate Authority submittal. DEP continues to work towards completion during FY2015.</p> |

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| Objective 3.2: Preserve Land. Conserve resources and prevent land contamination by reducing waste generation, increasing recycling, and ensuring proper management of waste and petroleum products. | | | |
| Work Plan Component: Sustainable Materials Management and Waste Minimization | Work Year: 3 FTE | Fiscal Year: 2014 EPA Contact: Andrea Barbieri State Contacts: Glenn Mitzel, Kevin Beer | FY15 commitments will be negotiated in the fourth quarter of FY14 |
| | % of Funding Allocated: 6% | | |
| Measures | Planned Accomplishments | | Midyear/ End of Year Status/Comments |
| State Level Results: <u>Waste Minimization</u> | Waste Minimization S.1 The Bureau of Waste Management is dedicating efforts to implement Pennsylvania’s Covered Device Recycling Act (CDRA), Act 108 of 2010. The CDRA requires establishment of recycling programs for certain covered devices; imposes duties on manufacturers and retailers of certain covered devices; provides for enforcement; establishes the Electronic Materials Recycling Account to fund activities under the Act; and prescribes penalties. Effective January 24, 2013, desktop computers, laptop computers, computer monitors, computer peripherals, televisions, and any components of such devices may no longer be disposed in Pennsylvania with municipal waste. Additionally, covered devices that are not from an occupant of a single detached dwelling unit or a single unit of a multiple dwelling unit who has used a covered device primarily for personal or small business may no longer dispose of these devices or their components at that time. All of these devices are required to be properly recycled. Currently, at least 40 permanent electronic collection programs are operating in Pennsylvania. Between permanent electronic collection programs and periodic collection events, over 93 percent of the people in the Commonwealth have access to public recycling options. | | S.1 Midyear Status and EOY Status: Currently, there are 44 permanent electronic collection programs are operating in Pennsylvania. The manufacture sponsored recycling plans which were due to be submitted to the Department for review by January 31, 2014, were delayed until May 1, 2014. Manufacturer and retail sponsored drop off locations that accept computers, monitors, and other types of electronic waste are now approved in Pennsylvania. |

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Pennsylvania Department of Environmental Protection
FY 2014

Goal 3 Cleaning up Communities and Advancing Sustainable Development – Clean up communities, advance sustainable development, and protect disproportionately impacted low-income, minority, and tribal communities. Prevent releases of harmful substances and clean up and restore contaminated areas.

Objective 3.2: Preserve Land. Conserve resources and prevent land contamination by reducing waste generation, increasing recycling, and ensuring proper management of waste and petroleum products.

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| Work Plan Component: Sustainable Materials Management and Waste Minimization | Work Year: 3 FTE | Fiscal Year: 2014 EPA Contact: Andrea Barbieri State Contacts: Glenn Mitzel, Kevin Beer | FY15 commitments will be negotiated in the fourth quarter of FY14 |
| | % of Funding Allocated: 6% | | |

| Measures | Planned Accomplishments | Midyear/ End of Year Status/Comments |
|----------|--|---|
| | <p>S.2 Continue Efforts to recycle mercury through the PA Mercury Thermostat Program</p> <p>S.3 Schools Chemical Cleanout – Schools Chemical Cleanout Campaign. PADEP will continue to support the safe management of chemicals in schools. This will include training selected personnel from participating schools and chemical cleanouts.</p> | <p>S.2 Midyear and EOY Status: Thermostat Recycling Corporation (TRC) coordinates the mercury thermostat collection efforts for the major manufacturers of thermostats. Based TRC's 2013 Annual Report, mercury thermostat collections in Pennsylvania resulted in recovery of 119 pounds of elemental mercury. This represents a 3.5% increase from 2012.</p> <p>S.3 Midyear Status: In 2013 the Schools Chemical Cleanout Project facilitated the disposal of over 8000 pounds of out of date, excess, and high risk chemicals from the 20 participating schools. A day-long training seminar, emphasizing best practices from an integrated chemical management perspective, was presented in all six DEP regions during November and December 2013. About 60 individuals representing 40 schools participated in the training to initiate the 2014 Schools Chemical Cleanout Campaign. EOY Status: During the summer of 2014 the School Chemical Cleanout Project facilitated the disposal of nearly 3000 pounds of out of date, excess, and high risk chemicals from the 13 participating schools.</p> |